#### RECEIVED



AUG 2 0 2019

Enforcement and Compliance Assurance Division

CERTIFIED MAIL 7015 3010 0001 0420 4723 RETURN RECEIPT REQUESTED

August 14, 2019

US EPA, Region 8 1595 Wynkoop Street Denver, CO 80202-1129

STATELINE NO.1 GAS PLANT
PERMIT TO OPERATE NO. T5-O15012 ISSUED 2/24/2016, RENEWAL DUE 2/24/2021
NSPS SUBPARTS KKK, OOOO, and OOOOa SEMIANNUAL MONITORING REPORT

Dear Director:

ONEOK Rockies Midstream, L.L.C. (ORM) submits the attached New Source Performance Standards (NSPS) Leak Detection and Repair (LDAR), Subparts KKK, OOOO, OOOOa, Report for the Stateline No.1 Gas Plant located in Williams County. This report is submitted for monitoring conducted from January 1, 2019 through June 30, 2019.

Please call Teresa Merrill at (701) 339-3352 or me at (918) 591-5009 if you have any questions regarding this report.

Sincerely,



W. Parke Moore Corporate LDAR Program Manager

Attachments: Stateline No. 1 Gas Plant - Semiannual LDAR Monitoring Report

ce: CERTIFIED MAIL 7015 3010 0001 0420 4730
RETURN RECEIPT REQUESTED
Jim Semerad
North Dakota Department of Environmental Quality
Division of Air Quality

918 E Divide, 2<sup>nd</sup> Floor Bismarck, ND 58501-1947

Note: Cover letter only to NDDEQ. Report submitted to NDDEQ as Attachment C of this period's SAR.

K. Rudningen / T. Merrill / T. Schwarz / A. Hernandez / D. Roensch / R. Brown (pdf).
Tulsa Environmental Files – Stateline GP - NDt2 0 Air Files 2 3 Compliance Reporting SAR\LDAR SAR\SL I\2019-8\_SLI

ONEOK Rockies Midstream 100 West Fifth Street Tulsa, OK 74103 www.oneok.com

#### **CERTIFICATION**

#### **FOR**

# NSPS SUBPARTS KKK, OOOO, OOOOa LDAR MONITORING REPORT

JANUARY 1, 2019 through JUNE 30, 2019

Facility Name: Stateline No. 1 Gas Plant

Facility Permit No.: PERMIT TO OPERATE NO. T5-015012 ISSUED 2/24/2016, RENEWAL

DUE 2/24/2021

Facility Location: SW/4 Sec. 21, T155N, R103W, Williams County, ND

I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

Name of Responsible Official (print or type): David C. Roensch

Title: Vice	<u>President – NGGP Operation</u>	<u>ıs</u>				
	(b) (6)					
				,	1	
Signature:			Date:	8/9	/19	
•			_	- 1	<i>y</i>	

#### ONEOK Rockies Midstream Stateline No. 1 Gas Plant

NSPS SUBPARTS KKK, OOOO, and OOOOa

LDAR MONITORING REPORT

JANUARY 1, 2019 through JUNE 30, 2019



July 19, 2019

Ms. Teresa Merrill Environmental Specialist ONEOK Rockies Midstream 896 25th Street SE Sidney, MT 59270

RE: Semiannual Leak Detection and Repair (LDAR) Monitoring Report, Stateline I Natural Gas Facility, Williams County, North Dakota

Dear Ms. Merrill:

During January 1 through June 30, 2019, Trihydro Corporation (Trihydro) completed routine monthly monitoring for fugitive emissions as required for the LDAR program at the ONEOK Rockies Midstream Stateline I (Stateline I) natural gas processing facility located in Williams County, North Dakota. Monitoring activities were completed to satisfy the requirements of the New Source Performance Standards (NSPS) Subpart KKK, Subpart OOOO, and Subpart OOOOa regulations. This report serves as the documentation required for submittal to the regulatory agencies for the January through June 2019 monitoring period.

#### NSPS Subpart KKK, OOOO and OOOOa Requirements

Subparts KKK, OOOO, and OOOOa require that a semiannual report be submitted for each process unit and month within the reporting period. The semiannual report must include:

- The number of valves, pressure relief devices (PRDs), pumps, compressors, and connectors (OOOO and OOOOa) for which leaks were detected.
- The number of valves, PRDs, pumps, compressors, and connectors (OOOO and OOOOa) for which leaks were not repaired as required or placed on the delay-of-repair (DOR) list.
- The facility is required to report the reason for each DOR, the dates of process unit shutdowns that occurred within the reporting period.
- Revisions to the component inventory.

#### Results

The Stateline I facility consists of seven process units subject to the Subpart KKK regulation, one process unit subject to the Subpart OOOO regulation, and two process units subject to the Subpart OOOOa regulation. Trihydro personnel monitored components in volatile organic compound service and wet gas service, in accordance with United States Environmental Protection Agency Method 21 protocol.



Ms. Teresa Merrill July 19, 2019 Page 2

During the January 1 through June 30, 2019 reporting period, 15 leaks were detected from components monitored as required by Subpart KKK and Subpart OOOO regulations and 11 leaks were detected from components monitored as required by the Subpart OOOOa regulation. Initial repairs were completed on 25 components identified as leaking and received a passing Method 21 inspection within the 15-day repair deadline. Maintenance and operations personnel indicated that 1 leaking component could not be repaired without a process unit shutdown. Therefore, authorization to put the 1 component on DOR was provided by Stateline personnel. The number of valves, pumps, PRDs, compressors, and connectors for which leaks were detected during the reporting period are included in Attachment A and B.

There were 17 components added to and 10 components deleted from Subpart KKK and Subpart OOOO process unit inventories during the reporting period. There were 622 components added to and 461 components deleted from Subpart OOOOa process unit inventory during the reporting period.

It should be noted that the Deethanizer Process Unit became subject to NSPS Subpart OOOOa through major modification in April 2019. Additionally, during the previous reporting periods there were several PRDs classified as Closed Vent System (CVS) components. During this reporting period, the CVS classification was removed from these PRDs and are now reported in each process unit. The revisions to the inventory are included in Attachment A.

The facility experienced scheduled shutdowns during the reporting period on April 3 through April 4, 2019 for the Cryo process unit.

If you have any questions or comments, please contact Kyle Haag at khaag@trihydro.com or Jeremy Sell at jsell@trihydro.com or by calling us at (701) 204-0065.

Sincerely, Trihydro Corporation

(b) (6)

Kyle Haag Project Manager

07M-023-009

Attachments

(b) (6)

Jeremy Sell Business Unit Manager – LDAR Services

#### ATTACHMENT A

EQUIPMENT LEAK REPORT, DELAY-OF-REPAIR COMPONENTS, AND REVISIONS TO THE PRIOR INVENTORY



From: 1/1/2019 To: 6/30/2019, Rule: NSPS - KKK

ONEOK - Stateline

Site:

STATELINE I

Unit:

#### CONDENSATE STABILIZATION

# Components: # Added: # Perm. OOS:	Valves: 337 0 0		Pumps: 0 0 0		Compressors: 0 0 0		Р	RVs: 11 0 0
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
January 2019	1	0	0	0	0	0	0	0
February 2019	1	0	0	0	0	0	0	0
March 2019	0	0	0	0	0	0	0	0
April 2019	0	0	0	0	0	0	0	0
May 2019	0	0	0	0	0	0	0	0
June 2019	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:



From: 1/1/2019 To: 6/30/2019, Rule: NSPS - KKK

ONEOK - Stateline

Site:

STATELINE I

Unit:

CONDENSATE STORAGE/LOADING

# Components: # Added: # Perm. OOS:	Valves: 203 0 0		Pumps: 2 0 0		Compressors: 0 0 0		PRVs: 10 0 0	
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
January 2019	0	0	0	0	0	0	0	0
February 2019	0	0	1	0	0	0	0	0
March 2019	0	0	0	0	0	0	0	0
April 2019	0	0	0	0	0	0	0	0
May 2019	0	0	0	0	0	0	0	0
June 2019	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:



From: 1/1/2019 To: 6/30/2019, Rule: NSPS - KKK

ONEOK - Stateline

Site:

STATELINE I

Unit:

CRYO

# Components: # Added: # Perm. OOS:	Valves: 823 2 2		Pumps: 7 0 0		Compressors: 0 0 0		PRVs: 41 0 0	
Month:	Leaking:	Not Repaired in Repair Period:	Leaking	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
January 2019	0	0	0	0	0	0	0	0
February 2019	2	0	0	0	0	0	0	0
March 2019	0	0	0	0	0	0	0	0
April 2019	0	0	0	0	0	0	0	0
May 2019	1	0	0	0	0	0	0	0
June 2019	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:



From: 1/1/2019 To: 6/30/2019, Rule: NSPS - KKK

ONEOK - Stateline

Site:

STATELINE I

Unit:

FLARE

# Components: # Added: # Perm. OOS:	Valves: 22 0 0		Pumps: 2 0 0		Compressors: 0 0 0		PRVs: 4 0 0	
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
January 2019	0	0	0	0	0	0	0	0
February 2019	0	0	0	0	0	0	0	0
March 2019	0	0	0	0	0	0	0	0
April 2019	0	0	0	0	0	0	0	0
May 2019	0	0	0	0	0	0	0	0
June 2019	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:



From: 1/1/2019 To: 6/30/2019, Rule: NSPS - KKK

ONEOK - Stateline

Site:

STATELINE I

Unit:

**METHANOL** 

# Components: # Added: # Perm. OOS.	Valve	s: 61 0 0	Pump	s: 2 0 0	Compres	ssors: 0 0 0	Р	RVs: 2 0 0
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
January 2019	0	0	0	0	0	0	0	0
February 2019	0	0	0	0	0	0	0	0
March 2019	0	0	0	0	0	0	0	0
April 2019	0	0	0	0	0	0	0	0
May 2019	0	0	0	0	0	0	0	0
June 2019	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:



From: 1/1/2019 To: 6/30/2019, Rule: NSPS - KKK

ONEOK - Stateline

Site:

STATELINE I

Unit:

PRODUCT STORAGE

# Components: # Added: # Perm. OOS:	Valves: 187 0 0		Pumps: 6 0 0		Compressors: 0 0 0		Р	RVs: 9 0 0
Month:	Leaking	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period	Leaking:	Not Repaired in Repair Period:	Leaking	Not Repaired in Repair Period
January 2019	0	0	0	0	0	0	0	0
February 2019	0	0	0	0	0	0	0	0
March 2019	0	0	0	0	0	0	0	0
April 2019	0	0	0	0	0	0	0	0
May 2019	0	0	0	0	0	0	0	0
June 2019	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:



From: 1/1/2019 To: 6/30/2019, Rule: NSPS - KKK

ONEOK - Stateline

Site:

STATELINE I

Unit:

REFRIGERATION

# Components: # Added: # Perm. OOS:	Valves: 426 1 0		Pumps: 4 0 0		Compressors: 0 0 0		PRVs: 19 0 0	
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period
January 2019	0	0	0	0	0	0	0	0
February 2019	0	0	0	0	0	0	0	0
March 2019	0	0	0	0	0	0'	0	0
April 2019	0	0	0	0	0	0	0	0
May 2019	0	0	0	0	0	0	0	0
June 2019	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:



From: 1/1/2019 To: 6/30/2019, Rule: NSPS - OOOO

ONEOK - Stateline

Site:

STATELINE I

Unit:

INLET

Count: # Added: # Perm. OOS:	Valves: 346 0 0		Pumps: 0 0 0		Compressors: 0 0 0		PRVs: 5 0 0		Connec	ctors: 269 14 8
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period	Leaking:	Not Repaired in Repair Period	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
Jan 2019	3	0	0	0	0	0	0	0	0	0
Feb 2019	0	0	0	0	0	0	0	0	0	0
Mar 2019	0	0	, 0	0	0	0	0	0	0	0
Apr 2019	3	0	0	0	0	0	0	0	1	0
May 2019	1	0	0	0	0	0	0	0	0	0
Jun 2019	0	0	0	0	0	0	0	0	1	1

Delay of Repairs:

Area:

Tag: Leak Date:

Repair Date:

Type:

Reason:

NA

57049-T01

6/4/2019

Not Repaired

CON

REPAIR IS TECHNICALLY

INFEASIBLE W/O A

SHUTDOWN

Late Repairs:



From: 1/1/2019 To: 6/30/2019, Rule: NSPS - OOOOa

ONEOK - Stateline

Site:

STATELINE I

Unit:

NGL METER RUN

Count: # Added: # Perm. OOS:	Valves: 163 0 0		Pumps: 0 0 0		Compressors: 0 0 0		PRVs: 0 0 0		Connec	otors: 510 0 0
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period	Leaking:	Not Repaired in Repair Period:
Jan 2019	0	0	0	0	0	0	0	0	0	0
Feb 2019	0	0	0	0	0	0	0	0	0	0
Mar 2019	0	0	0	0	0	0	0	0	0	0
Apr 2019	0	0	0	0	0	0	0	0	0	0
May 2019	0	0	0	0	0	0	0	0	0	0
Jun 2019	0	0	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:



From: 1/1/2019 To: 6/30/2019, All Rules

ONEOK - Stateline

Site:

STATELINE I

Unit:

**DEETHANIZER** 

Count: # Added: # Perm. OOS:	Valves: 497 189 164		Pumps: 2 2 4		Compressors: 2 2 2		PRVs: 8 5 0		Connec	otors: 5496 424 291
Month:	Leaking:	Not Repaired in Repair Period:	Leaking	Not Repaired in Repair Period:	Leaking.	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
Jan 2019	0	0	0	0	0	0	0	0	0	0
Feb 2019	0	0	0	0	0	0	0	0	0	0
Mar 2019	0	0	0	0	0	0	0	0	0	0
Apr 2019	0	0	0	0	0	0	0	0	0	0
May 2019	1	0	0	0	0	0	0	0	8	0
Jun 2019	0	0	0	0	0	0	0	0	2	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:

# ATTACHMENT B EPA CDX REPORTING TABLE

An owner or operator must include the following information in the initial semiannual report in addition to the information required in §60.487a(b)(1) through (4): Number of pressure relief devices subject to the requirements of §60.5401a(b) except for those pressure relief devices designated for no detectable emissions under the provisions of §60.482-4a(a) and those pressure relief devices complying with §60.482-4a(c).

#### The asterisk (\*) next to each field indicates that the corresponding field is required.

		EQUIP	MENT INFORMATION		
Facility Record No. * (Select from dropdown list)	Process unit Identification * (§60.487a(b)(1))	Number of pressure relief devices * (560.5422a(b))	those valves designated for no detectable emissions * (\$60.487a(b)(2))	pumps designated for no detectable	Number of connectors * (§60.487a(b)(5), §60.5422a(a))
	e.g.: HVDry-1a	e.g.: 5	e.g.: 5	e.g.: 5	e.g.: 5
1	DEETHANIZER		8 497	2	5496
1	NGL METER RUN	20	0 163	0	510

An owner or operator must include the information specified in paragraphs (c)(1) and (2) of this section in all semiannual reports in addition to the information required in §60.487a(c)(2)(i) through (vi): (1) Number of pressure relief devices for which leaks were detected as required in §60.5401a(b)(2); and (2) Number of pressure relief devices for which leaks were not repaired as required in §60.5401a(b)(3).

The asterisk (\*) next to each field indicates that the corresponding field is required.

#### **EQUIPMENT INFORMATION**

Facility Record No. " (Select from dropdow n list)	Month Identificati on" (Select from dropdown list)	pressure relief devices for which leaks were detected *	which leaks were not repaired *	Number of valves for which leaks were detected * (§60.487a(c) (2)(i))	repaired *	Number of pumps for which leaks were detected * (§60.487a(c)( 2)(iii))	Number of pumps for which leaks were not repaired * (\$60.487a(c)(2)( iv))	Number of connectors for which leaks were detected * (§60.487a(c)(2)(vi i), §60.5422a(a))	Number of connectors for which leaks were not repaired * (§60.487a(c)(2)(viii), §60.5422a(a))
		e.g.: 5	e.g.: 5	e.g.: 5	e.g.: 5	e.g.: 5	e.g.: 5	e.g.: 5	e.g.: 5
1	January	0	0	0	0	0	0	0	0
1	February	0	0	0	0	0	0	0	0
1	March	0	0	0	0	0	0	0	0
1	April	0	0	0	0	0	0	0	0
1	May	0	0	1	0	0	0	8	0
1	June	0	0	0	0	0	0	2	0